

**THE PROPERTY MANAGEMENT
CONNECTION, LLC, et al.,**

Plaintiffs,

V.

**CONSUMER FINANCIAL
PROTECTION BUREAU, et al.,**

Defendants.

Case No.: 3:21-cv-00359
JUDGE RICHARDSON
MAGISTRATE JUDGE NEWBERN

UNOPPOSED MOTION TO ENLARGE TIME TO RESPOND TO COMPLAINT

The Defendants, pursuant to Rule 6 (b)(1)(A) of the Federal Rules of Civil Procedure, move this Court for an extension of time to respond to the Complaint filed in this Matter. As grounds, the Government Respondents respectfully submit, as follows:

1. The Complaint was filed on May 4, 2021. (D.E. 1: Complaint.)
2. Simultaneous with the filing of the Complaint, the Plaintiffs sought a temporary restraining order (D.E. 6: Motion for TRO), which the Court denied on May 14, 2021. (D.E. 24: Order.)
3. As the Court is aware this case concerns the Consumer Financial Protection Bureau's Interim Final Rule, which requires certain debt collectors to disclose that tenants may be protected by an Order of the Centers for Disease Control (CDC). The CDC's Order is set to expire on June 30, 2021. Whether the Order expires or is renewed by the CDC directly impacts this case, including the response of the Defendants to the Complaint.
4. Responses to the Complaint are currently due to be filed on or before July 6, 2021, less than a week following the scheduled expiration or renewal of the Order. It is respectfully

submitted that more time is needed for the Defendants to review the outcome of the decision on the Order and to adequately respond to the allegations of the Complaint in light of any such developments. Accordingly, the Defendants request a thirty-day extension of time to respond to the Complaint, making responses due on or before August 5, 2021.

5. The undersigned has conferred with opposing counsel, and this motion is unopposed.

Based on the foregoing, the Defendants respectfully submit that there is good cause shown, and the Court should grant the enlargement of time requested.

Respectfully submitted,

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Middle District of Tennessee

s/J. Matthew Blackburn
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CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2021, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent to the following, if registered, by operation of the Court's electronic filing system. If not registered, notice was sent by First Class, United States mail, to:

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